THE CITY OF
PLEASANTON

January 31, 2014

Bruce H. Wolfe, Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Long-Term Trash Load Reduction Plan

Dear Me Wolfe:

The City of Pleasanton is please to submit its Long-Term Trash Load Reduction Plan in compliance with Order No. R2-2009-0074, for the Municipal Regional Stormwater Permit No. CAS612008.

Should you have any questions in regard to this report, please contact Daniel Smith, Operations Services Department Director, at 925-931-5509.

Sincerely,

Daniel Smith

DS: sl

Enclosure

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Streets
Sewer/Storm
Support Services
Parks
Water

Long-Term Trash Load Reduction Plan and Assessment Strategy

January 31, 2014

Submitted by:

THE CITY OF
PLEASANTON
P.O. Box 520, Pleasanton, CA 94566

In compliance with Provisions C.10.c of Order R2-2009-0074

City of Pleasanton
LONG-TERM TRASH LOAD REDUCTION PLAN AND ASSESSMENT STRATEGY

CERTIFICATION STATEMENT

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature by Duly Authorized Representative:

Daniel Smith
Director of Operations

January 31, 2014

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ABBREVIATIONS

BASMAA	Bay Area Stormwater Management Agencies Association
BID	Business Improvement District
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CASQA	California Stormwater Quality Association
CDS	Continuous Deflection Separator
CEQA	California Environmental Quality Act
CY	Cubic Yards
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
GIS	Geographic Information System
MRP	Municipal Regional Stormwater NPDES Permit
MS4	Municipal Separate Storm Sewer System
NGO	Non-Governmental Organization
NPDES	National Pollutant Discharge Elimination System
SFRWQCB	San Francisco Regional Water Quality Control Board
SWRCB	State Water Resource Control Board
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
Water Board	San Francisco Regional Water Quality Control Board
WDR	Waste Discharge Requirements

PREFACE

The City of Pleasanton Stormwater Management Program continues to be implemented in compliance with the San Francisco Bay Municipal Regional National Pollutant Discharge Elimination System (NPDES) permit (Order R2-2009-0074), the federal Clean Water Act (1972), and subsequent CWA amendments, all of which were adopted to protect receiving waters such as rivers, lakes and oceans from contamination by controlling pollutants from entering municipal separate storm sewer systems (MS4s). The City of Pleasanton complies with CWA guidelines through its NPDES permit and is committed to preserving and maintaining the quality of our waterways and receiving waters while improving marine habitat and the quality of life for our residents.

The City's Operations Services Department (OSD) administers this citywide program. The objective of the stormwater program is to improve the quality of storm water runoff by effectively prohibiting non-storm water discharges and by reducing the discharge of pollutants to the maximum extent practicable (MEP). All City departments are involved in the cooperative effort to implement the program, while it is the OSD's responsibility to coordinate the development, implementation, and revision of the Stormwater Management Program.

This Long-Term Trash Load Reduction Plan and Assessment Strategy (Long-Term Plan) is submitted in compliance with provision C.10.c of the Municipal Regional Stormwater NPDES Permit (MRP) for Phase I communities in the San Francisco Bay. The Long-Term Plan was developed using a regionally consistent outline and guidance developed by the Bay Area Stormwater Management Agencies Association (BASMAA) and reviewed by San Francisco Bay Regional Water Quality Control Board staff. The Long-Term Plan is consistent with the Long-Term Trash Load Reduction Framework developed in collaboration with Water Board staff. Its content is based on the City of Pleasanton's current understanding of trash problems within its jurisdiction and the effectiveness of control measures designed to reduce trash impacts associated with MS4 discharges. This Long-Term Plan is intended to be iterative and may be modified in the future based on information gained through the implementation of trash control measures. The City of Pleasanton therefore reserves the right to revise or amend this Long-Term Plan at its discretion. If significant revisions or amendments are made by the City, a revised Long-Term Plan will be submitted to the Water Board through the City's annual reporting process.

1.0 Introduction

1.1 Purpose of Long-Term Trash Reduction Plan

Provision C.10.c of the Municipal Regional Permit (MRP) requires Permittees to submit a *Long-Term Trash Load Reduction Plan* (Long-Term Plan) by February 1, 2014. Long-Term Plans must describe control measures that are currently being implemented, including the level of implementation, and additional control measures that will be implemented and/or increased in order to attain a 70% trash load reduction by July 1, 2017, and 100% (i.e., "No Visual Impact") by July 1, 2022. The Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit for Phase I communities in the San Francisco Bay (Order R2-2009-0074), also known as the Municipal Regional Permit, became effective on December 1, 2009. The MRP applies to 76 large, medium and small municipalities (cities, towns and counties) and flood control agencies in the San Francisco Bay Region, collectively referred to as Permittees.

This Long-Term Trash Reduction Plan (LTTRP) is submitted by the City of Pleasanton as a framework for our good-faith effort to eliminate trash from San Francisco Bay that comes from the City of Pleasanton's municipal separate storm sewer system (MS4), which is regulated by NPDES Permit requirements. This Long-Term Plan includes:

1. Descriptions of the current level of implementation of trash control measures, and the type and extent to which new or enhanced control measures will be implemented to achieve a target of 100% (i.e. full) trash reduction from MS4s by July 1, 2022, with an interim milestone of 70% reduction by July 1, 2017;
2. A description of the *Trash Assessment Strategy* that will be used to assess progress towards trash reduction targets achieved as a result of control measure implementation; and,
3. Time schedules for implementing control measures and the assessment strategy.

1.2 Background

1.2.1 Long-Term Trash Load Reduction Plan Framework

A workgroup of MRP Permittee representatives and Water Board staff met between October 2012 and March 2013 to better define the process for developing and implementing Long-Term Plans, methods for assessing progress toward reduction goals, and tracking and reporting requirements associated with provision C.10. Through these discussions, an eight-step framework for developing and implementing Long-Term Plans was created by the workgroup (Figure 1).

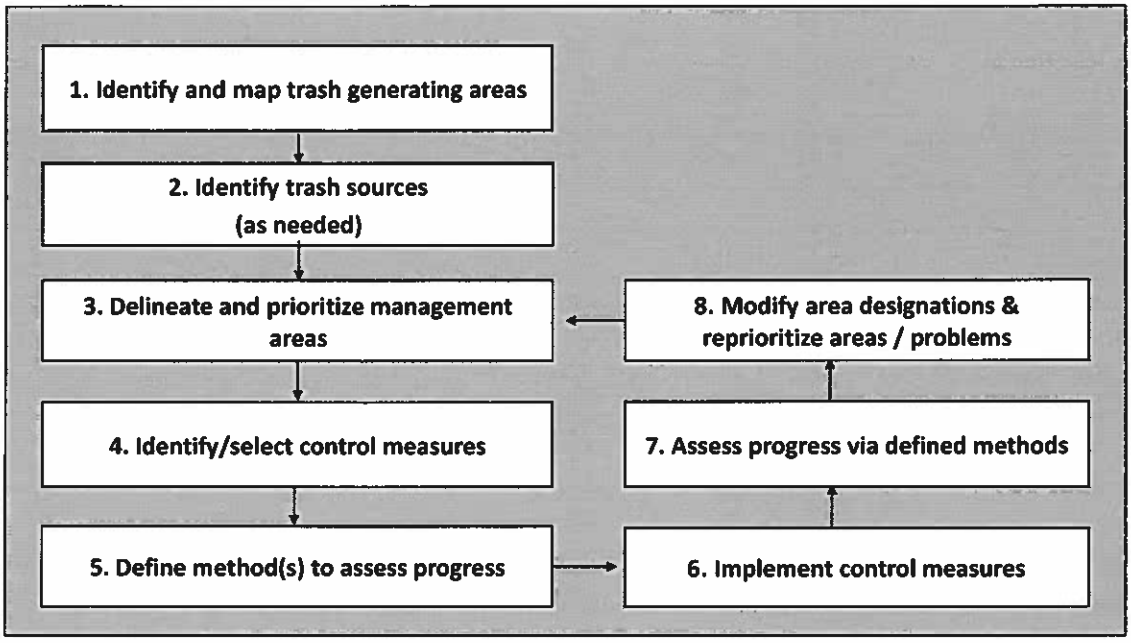


Figure 1-1. Eight-step framework for developing, implementing and refining Long-Term Trash Reduction Plans.

The workgroup agreed that as the first step in the framework, Permittees would identify very high, high, moderate, and low trash generating areas in their jurisdictional areas. Trash generation rates developed through the *BASMAA Baseline Trash Generation Rates Project* (as discussed below) were used as a starting point for differentiating and delineating land areas with varying levels of trash generation. Permittees would then use local knowledge and field and/or desktop assessments to confirm or refine the level of trash generation for specific areas within their jurisdiction. Each Permittee would then develop a map depicting trash generation categories within their jurisdiction.

As a next step, Permittees would then delineate and prioritize Trash Management Areas (TMAs) where specific control measures exist or are planned for implementation. TMAs delineated by Permittees are intended to serve as reporting units in the future. Reporting at the management area level provides the level of detail necessary to demonstrate implementation and progress towards trash reduction targets.

Once control measures are selected and implemented, Permittees will evaluate progress toward trash reduction targets using outcome-based assessment methods. As the results of the progress assessments are available, Permittees may choose to reprioritize trash management areas and associated control measures designed to improve trash reduction within their jurisdictions.

1.2.2 BASMAA Generation Rates Project

Through approval of a BASMAA regional project in 2010, Permittees agreed to work collaboratively to develop a regionally consistent method to establish trash generation rates within their jurisdictions. The project, also known as the *BASMAA Trash Generation Rates Project* (Generation Rates Project) assisted Permittees in establishing the rates of

trash generation and identifying very high, high, moderate and low trash generating areas.

The term "trash generation" refers to the rate at which trash is produced or generated onto the surface of the watershed and is potentially available for transport via MS4s to receiving waters. Generation rates do not explicitly take into account existing control measures that intercept trash prior to transport. Generation rates are expressed as trash volume/acre/year and were established via the Generation Rates Project.

In contrast to trash generation, the term "trash loading" refers to the rate at which trash from MS4s enters receiving waters. Trash loading rates are also expressed as trash volume/acre/year and are equal to or less than trash generation rates because they account for the effects of control measures that intercept trash generated in an area before it is discharged to a receiving water. Trash loading rates are specific to particular areas because they are dependent upon the effectiveness of control measures implemented within an area. Figure 1-2 illustrates the difference between trash generation and loading.

Figure 1-2. Conceptual model of trash generation, interception and load.

Trash generation rates were estimated based on factors that significantly affect trash generation (i.e., land use and income). The method used to the establish trash generation rates for each Permittee builds off "lessons learned" from previous trash loading studies conducted in urban areas (Allison and Chiew 1995; Allison et al. 1998; Armitage et al. 1998; Armitage and Rooseboom 2000; Lippner et al. 2001; Armitage 2003; Kim et al. 2004; County of Los Angeles 2002, 2004a, 2004b; Armitage 2007). The method is based on a conceptual model developed as an outgrowth of these studies (BASMAA 2011b).

Trash generation rates were developed through the quantification and characterization of trash captured in Water Board-recognized full-capture treatment devices installed in the San Francisco Bay area. Trash generation rates estimated from this study are listed for each land use type in **Table 1-1**. Methods used to develop trash generation rates are more fully described in BASMAA (2011b, 2011c, and 2012).

Table 1-1. San Francisco Bay Area trash generation rates by land use (gallons/acre/year).

Land Use	Low[b]	Best[b]	High[b]
Commercial & Services	0.7	**6.2**	17.3
Industrial	2.8	**8.4**	17.8
Residential[a]	0.3 - 30.2	**0.5 - 87.1**	1.0 - 257.0
Retail[a]	0.7 - 109.7	**1.8 - 150.0**	4.6 - 389.1
K-12 Schools	3	**6.2**	11.5
Urban Parks	0.5	**5.0**	11.4

[a] For residential and retail land uses, trash generation rates are provided as a range that takes into account the correlation between rates and household median income.

[b] For residential and retail land uses: Low = 5% confidence interval; Best = best fit regression line between generation rates and household median income; and, High = 95% confidence interval. For all other land use categories: High = 90th percentile; Best = mean generation rate; and, Low = 10th percentile.

1.3 Organization of Long-Term Plan

This Long-Term Plan is organized into the following sections:

1.0 Introduction;
2.0 Scope of the Trash Problem;
3.0 Trash Management Areas and Control Measures; and
4.0 Trash Assessment Strategies; and

2.0 Scope of the Trash Problem

2.1 Permittee Characteristics

Incorporated in 1894, the City of Pleasanton is located in Alameda County, and has a jurisdictional area of 677,445,120 acres. According to the 2010 Census, it has a population of 70,285, with a population density of 2,900 people per square mile and average household size of 2.77. Of the 70,285 residents who call the City of Pleasanton home, 27.1% are under the age of 18, 6.2% are between 18 and 24, 24.6% are between 25 and 44, 31.3% are between 45 and 64, and 10.9% are 65 or older. The median household income was $115,188 in 2010. The City of Pleasanton is home to a number of corporate headquarters, including Safeway, Blackhawk Network, Thoratec, Workday, Simpson Manufacturing, the Cooper Companies, Shaklee, Patelco Credit Union, People Soft, Clorox, and Ross Stores.

Land uses within the City of Pleasanton depicted in ABAG (2005) are provided in Table 2. The City of Pleasanton is primarily comprised of eight land uses. These include Commercial and Services, Industrial, Residential, Retail, K-12 Schools, Urban Parks, Mixed Use, and Other.

Although economic conditions in the San Francisco Bay Region have been improving over the last couple of years, municipalities are only now starting to get their financial heads above water. In this uncertain environment the City of Pleasanton's Stormwater Program is facing a number of challenges:

- Increased workloads, depleted staff, and the necessity to implement an ever-increasing number of state-mandated regulations.
- Implementation of TMDL's and inspections of businesses and point sources.
- Lack of General Fund dollars, including monies to match grants, for Capital Improvement Projects (CIP) and special studies aimed at improving water quality.
- Diminished State-wide bond funded competitive grant programs for trash capture devices.
- Significant cost increases in energy, construction, raw materials, and labor.

In addition, the City of Pleasanton is at a serious disadvantage when it comes to controlling the amount of trash that enters and leaves our jurisdictional boundary. Pleasanton is located downstream of the cities of Livermore, Dublin, and San Ramon. All of the streams and arroyos that run through the city originate outside the city's boundary, which means if our neighboring cities are less than successful at meeting their trash reduction goals then their trash becomes our responsibility. Moreover, the City of Pleasanton does not have jurisdiction over these substantial storm water conveyance systems, thus making compliance with the 100% trash capture goal nearly impossible to achieve. Further, Pleasanton is located at the Crossroads of two major Interstate Highways (I-580 and I-680), the two most eastern terminuses of the Bay Area Rapid Transit (BART) commuter train system, an ACE train station, and the Alameda County Fairgrounds, none of which does the City of Pleasanton have jurisdictional authority to capture trash.

Despite these challenges the City of Pleasanton is committed to reducing trash to the greatest extent practicable. To demonstrate this commitment the City has already hired an Assistant Director of Operations Services who has extensive stormwater management experience, plus the intention of hiring an additional stormwater program specialist to complete a newly created stormwater management team within the soon-to-be created Environmental Services Division within the department.

Table 2-1. Percentages of the City of Pleasanton's jurisdictional area[1] within land use classes identified by ABAG (2005)

Land Use Category	Jurisdictional Area (Acres)	% of Jurisdictional Area
Residential	7831.8	53.0%
Other	2929.6	19.8%
Commercial and Services	2086.2	14.1%
Mixed Use	752.3	5.1%
Retail	692.5	4.7%
K-12 Schools	250.4	1.7%
Industrial	222.4	1.5%
Total	14765.2	99.9%

2.2 Trash Generating Areas

2.2.1 Generation Categories and Designation of Areas

The process and methods used to identify the level of trash generation within the City of Pleasanton are described in this section and illustrated in Figure 2-1.

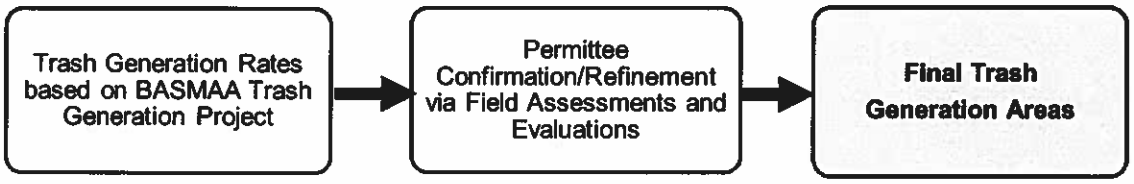


Figure 2-1. Development of Trash Generation Areas

[1] A Permittee's jurisdictional area is defined as the urban land area within a Permittee's boundary that is not subject to stormwater NPDES Permit requirements for traditional and non-traditional small MS4s (i.e. Phase II MS4s) or the California Department of Transportation, or owned and maintained by the State of California, the U.S. federal government or other municipal agency or special district (e.g., flood control district).

Trash generation rates, developed through *the BASMAA Trash Generation Rates Project,* were applied to parcels within the City of Pleasanton and used to create a Draft Trash Generation Map (see pg. 10) that served as a starting point for the City of Pleasanton to identify areas of concern. Levels of trash generation are depicted on the map using four trash generation rate (gallons/acre/year) categories.

Table 2-2. Trash generation categories and associated generation rates (gallons/acre/year).

Category	**Very High**	**High**	**Moderate**	**Low**
Generation Rate (gallons/acre/year)	**> 50**	**10-50**	**5-10**	**< 5**

The City of Pleasanton then conducted on-land visual assessments, based upon the protocols developed by BASMAA, and reviewed and refined the draft trash generation map to ensure that trash generation categories were correctly assigned to parcels or groups of parcels.

a. On-Land Visual Assessments

The On-land Visual Trash Assessment Protocol entails walking a street segment and visually observing the level of trash present on the roadway, curb and gutter, sidewalk, and other areas adjacent to the street that could potentially contribute trash to the MS4. Based on the level of trash observed, each segment (i.e., assessment area) was placed into one of four on-land assessment condition categories that are summarized in Table 2-3. The City assessed 68 stretches of streets, channels, and parking areas that have the potential to convey trash to the MS4 and refined those locations into 21 trash management areas (see section 3.2).

Table 2-3. Definitions of on-land trash assessment condition categories.

On-land Assessment Condition Category	**Summary Definition**
A (Low)	Effectively no trash is observed in the assessment area.
B (Moderate)	Predominantly free of trash except for a few pieces that are easily observed.
C (High)	Trash is widely/evenly distributed and/or small accumulations are visible on the street, sidewalks, or inlets.
D (Very High)	Trash is continuously seen throughout the assessment area, with large piles and a strong impression of lack of concern for litter in the area.

b. Querying Municipal Staff or Members of the Public

Pleasanton is a relatively small city and many city employees have long tenures working throughout the city, so it wasn't too difficult to query them about potential locations where significant amounts of trash tend to accumulate. Based on assessments conducted to confirm/refine trash generation category designations, the City updated its trash generation map, which depicts the most current understanding of trash generation within the City of Pleasanton. The City documented this process by tracking the information collected through the assessments and subsequent refinements to the Draft Trash Generation Map (see Figure 2-2).

2.2.2 Summary of Trash Generating Areas and Sources

Summary statistics for land use and trash generation categories generated through the mapping and assessment process are presented in Table 2-4.

Table 2-4. Percentage of jurisdictional area within the City of Pleasanton assigned to each trash generation category.

Trash Generation Category	Commercial and Services	Industrial	Residential	Retail	K-12 Schools	Urban Parks	Other	Mixed Use
Very High	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*
High	*0.0%*	*0.0%*	*0.0%*	*98.6%*	*0.0%*	*0.0%*	*1.4%*	*0.0%*
Medium	*41.2%*	*3.7%*	*6.1%*	*30.4%*	*16.7%*	*0.0%*	*0.2%*	*1.8%*
Low	*11.4%*	*1.3%*	*58.8%*	*0.7%*	*0.1%*	*0.0%*	*22.2%*	*5.5%*

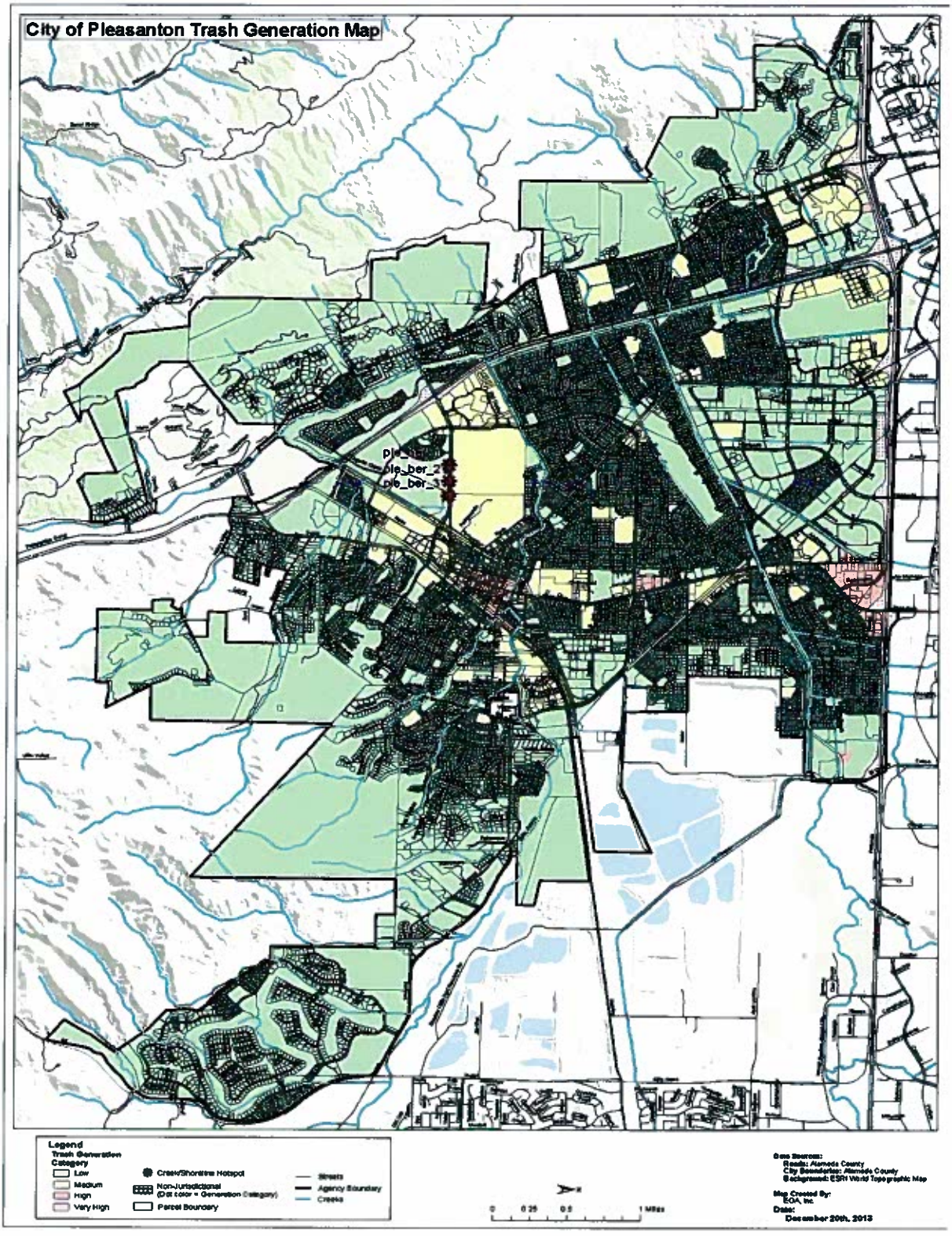


Figure 2-2. Trash Generation Map for the City Pleasanton

3.0 Trash Management Areas and Control Measures

This section describes the control measures that the City of Pleasanton has, or plans to, implement to reduce trash problems and hopefully achieve a target of 100% (i.e. full) trash reduction from their MS4 by July 1, 2022. It should be noted that based on visual inspection and empirical evidence the City of Pleasanton is a very clean city. The selection of control measures described in this section is based on the City of Pleasanton's current understanding of trash problems within its jurisdiction and the effectiveness of control measures designed to reduce trash impacts associated with MS4 discharges. Information on the effectiveness of some trash control measures is currently lacking and therefore in the absence of this information, the City based its selection of control measures on existing effectiveness information, their experience in implementing trash controls and knowledge of trash problems, and costs of implementation. As knowledge is gained through the implementation of these control measures, the City may choose to refine their trash control strategy described in this section. If significant revisions or amendments are made, a revised Long-Term Plan will be submitted to the Water Board through the City of Pleasanton's annual reporting process.

3.1 Management Area Delineation and Prioritization

Consistent with the long-term plan framework, the City of Pleasanton delineated and prioritized trash management areas (TMAs) based on the geographical distribution of trash generating areas, types of trash sources, and current or planned control measure locations. TMAs are intended to form the management units by which trash control measure implementation can be tracked and assessed for progress towards trash reduction targets. Once delineated, TMAs were also prioritized for control measure implementation. The City of Pleasanton's primary management areas were selected based on the spatial distribution of trash generating areas and the location of specific existing or planned management actions within City's jurisdiction. City staff used the following procedure to designate TMAs:

1. TMAs were prioritized based upon the amount of trash they are predicted to, or currently, generate;
2. The geographic size of the TMA combined with the number of BMPs it will take to capture trash for the entire area;
3. Opportunities for enhanced code enforcement activities that would include trash control, property maintenance, and construction material disposal.

A map depicting the City's TMAs is included as Figure 3-1. All jurisdictional areas within the City are included within a TMA. The amount of jurisdictional land area and associated trash condition categories for each TMA are included in Table 3-1.

Table 3-1. Jurisdictional area and percentage of each Trash Management Area (TMA) comprised of trash generation categories

TMA	Jurisdictional Area (Acres)	Trash Generation Category			
		Very High	High	Moderate	Low
1	177.2	0.0%	48.3%	51.3%	0.4%
2	91.3	0.0%	45.5%	54.3%	0.2%
3	26.1	0.0%	60.4%	39.6%	0.0%
4	266.3	0.0%	0.0%	100.0%	0.0%
5	21.4	0.0%	0.0%	100.0%	0.0%
6	43.0	0.0%	0.0%	100.0%	0.0%
7	256.7	0.0%	1.0%	57.9%	41.1%
8	294.2	0.0%	0.0%	100.0%	0.0%
9	120.0	0.0%	0.0%	100.0%	0.0%
10	102.3	0.0%	0.0%	100.0%	0.0%
11	43.4	0.0%	0.0%	100.0%	0.0%
12	128.2	0.0%	0.0%	100.0%	0.0%
13	28.7	0.0%	0.0%	100.0%	0.0%
14	14.8	0.0%	0.0%	100.0%	0.0%
15	19.2	0.0%	0.0%	100.0%	0.0%
16	25.2	0.0%	0.0%	100.0%	0.0%
17	17.8	0.0%	0.0%	100.0%	0.0%
18	10.8	0.0%	0.0%	100.0%	0.0%
19	9.5	0.0%	0.0%	100.0%	0.0%
20	12971.2	0.0%	0.0%	0.0%	100.0%
21	121.0	0.0%	0.0%	0.0%	100.0%

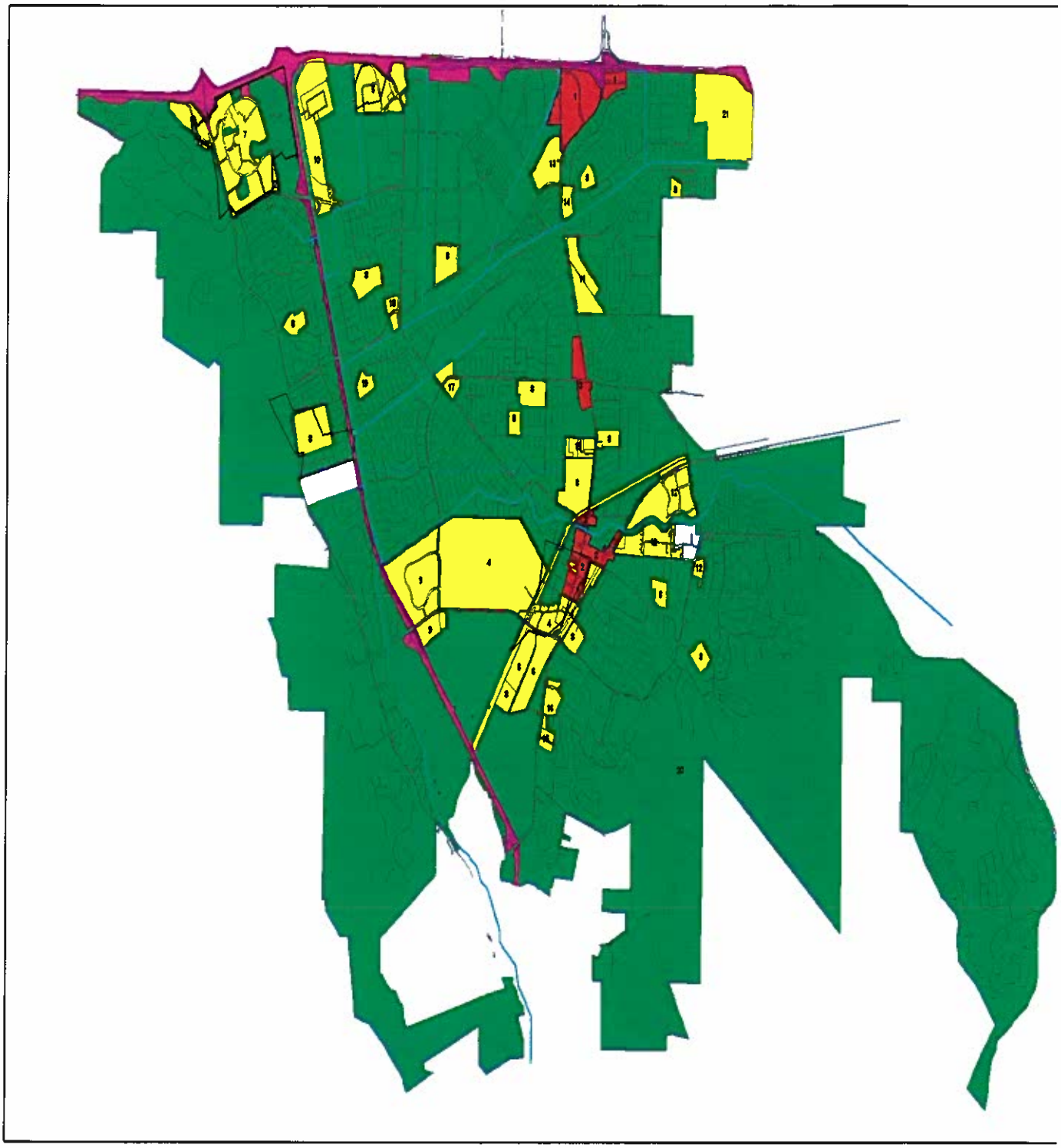


Figure 3-1. Trash Management Area Map for the City of Pleasanton

3.2 Current and Planned Trash Control Measures

Current trash control measures in practice city-wide include street sweeping, property maintenance, code enforcement, industrial commercial business inspections, and annual trash cleanup events. In October 2012 the City of Pleasanton installed full-capture devices thanks to a grant provided by the San Francisco Bay Estuary Project. The project encompassed the installation of seven trash nets at end-of-pipe locations in the southernmost, and downstream, areas of the city in an effort to capture the maximum amount of trash flowing through those particular storm drain segments. In addition, all new commercial and multi-unit residential construction projects have detention basins included in the construction plans.

In the future the city plans to complete another visual trash assessment, and depending on the availability of stormwater grant funding from the SWRQB, the city anticipates aggressively pursuing these funds to help pay for full trash capture devices. In particular the city has designated several locations where continuous deflective separation (CDS) devices can be installed and capture trash from the largest drainage area possible. In areas where CDS technology isn't practical the city intends to pursue catch basin insert technology.

The list of TMAs below is in order of priority:

3.2.1 Trash Management Area #1

Santa Rita Rd. and Pimlico St. Shopping Centers

This TMA is a made up of two shopping centers that include numerous fast food restaurants, gas stations, and two grocery stores. It has a high traffic volume predominately because of its proximity to I-580 freeway. The main trash sources are loose food wrappers and overfilled trash containers, generally located behind the retail buildings. Storm water from the western side of this TMA flows through underground pipes and outfalls into the Arroyo Mocho Canal (owned by Alameda County's Zone 7 Water Agency). Storm water from the eastern side of this TMA flows into a small concrete-lined v-ditch along Pimlico St.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division. This BMP will continue in effect beyond 2022.

Potential trash control measures:

- If adequate funding is available the city intends to install a full-capture CDS device as close as possible to the end of the storm drain pipe near the outfall to Arroyo Mocho Canal. This BMP should capture any trash emanating from the west side of this TMA.
- To increase trash capture on the east side of this TMA the city intends to install catch basin inserts in the storm drains that connect to the Pimlico St. v-ditch.

- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by the businesses in the area.

3.2.2 Trash Management Area #2

Downtown Pleasanton

The downtown area of Pleasanton is quaint with a small town atmosphere. Thus, it is the primary gathering place for residents and visitors. This TMA is comprised of many small businesses and several small cafes and restaurants with outside dining opportunities, making this is one of the high priority locations within the city for capturing derelict trash.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept every Monday and Friday. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The downtown shopping district drains to an area where the potential exists to site a full-capture device unit adjacent to the city's pump Station #7. If adequate funding is available the city intends to install a CDS device as close as possible to the end of the storm drain pipe at this location. This BMP should capture any trash emanating from the Downtown Pleasanton TMA.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by the businesses in the area.

3.2.3 Trash Management Area #3

Mission Plaza and Safeway Shopping Centers

These two shopping centers are fairly large by Pleasanton standards and generate enough trash to make this TMA a high priority. The centers are comprised of numerous small businesses including fast food restaurants, gas stations, and a large grocery store. The entire area drains to the Paseo Pleasanton Canal (city-owned).

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second and third Tuesday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal

Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- If adequate funding is available the city intends to install a full-capture CDS device as close as possible to the end of the storm drain pipe near the outfall to the Paseo Pleasanton Canal. This BMP should capture any trash emanating from the shopping centers plus any trash entering the storm drains in the residential neighborhoods between these shopping centers and the canal.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by the businesses in the area.

3.2.4 Trash Management Area #4

Alameda County Fairgrounds

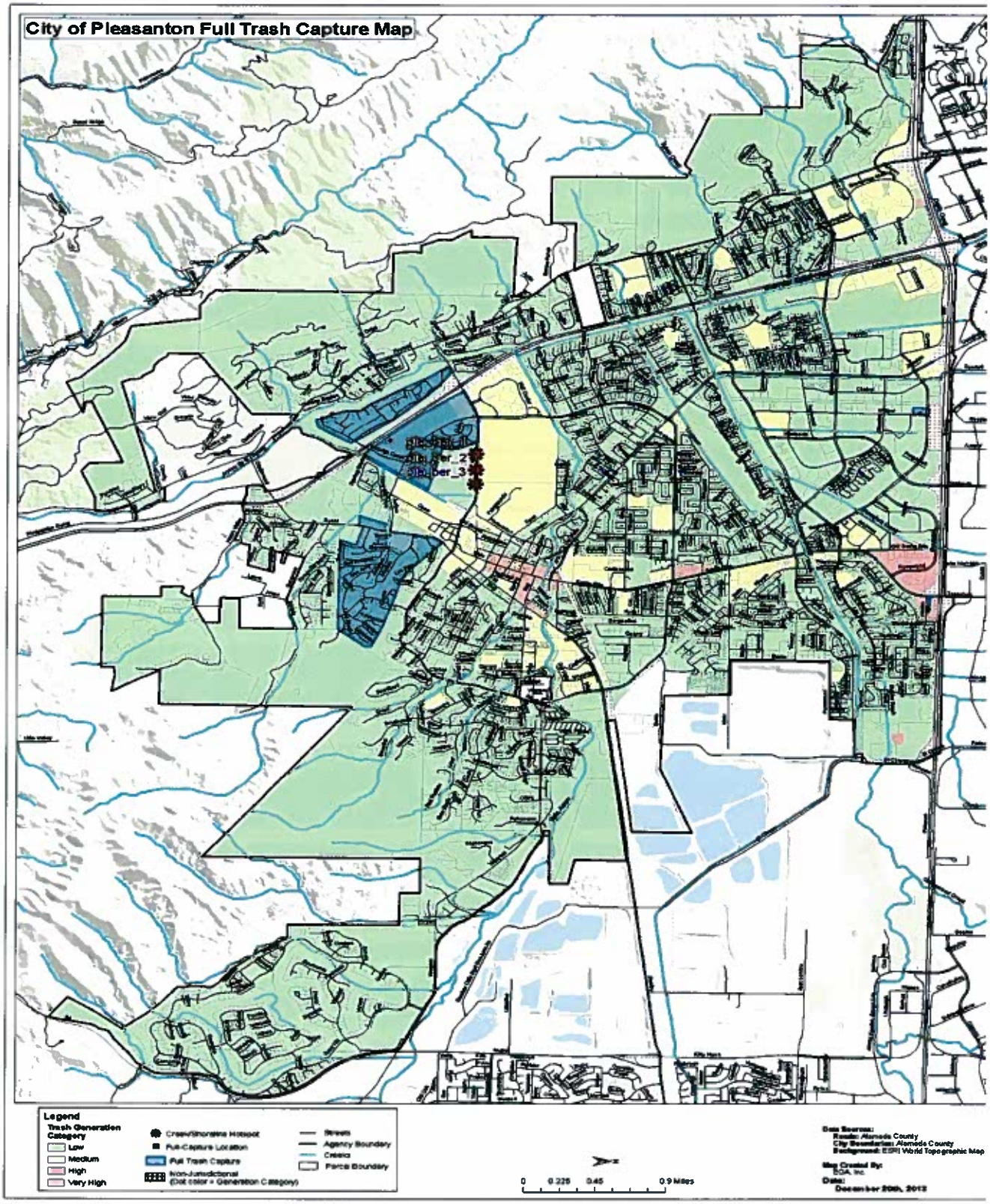
This TMA is somewhat of a challenge for the city because we do not have jurisdictional authority over the adjacent County Fairgrounds and cooperation between the county's concessionaire and the City has been challenging. Although the fairgrounds have their own storm water protocols the site drains into a city-owned earthen channel on the south side of Bernal Ave.

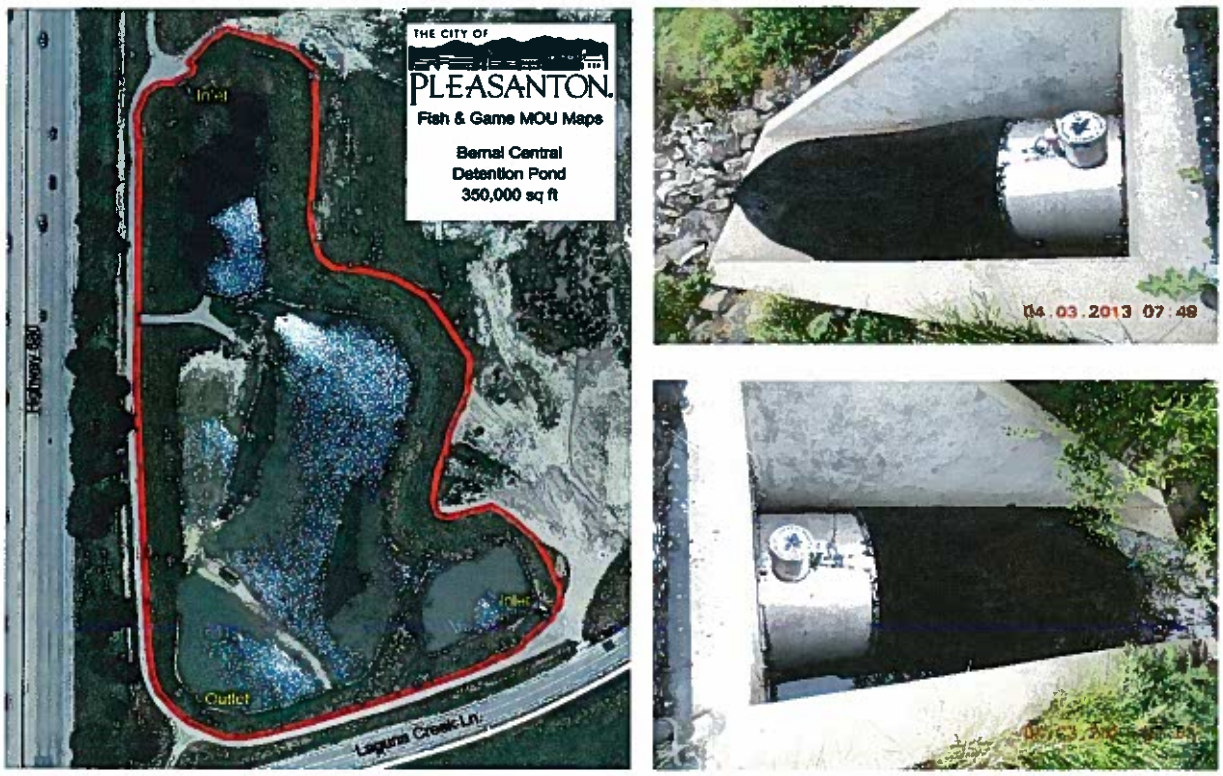
Ongoing trash control measures:

- The previously mentioned trash nets installed on the southern part of the city (see full trash capture map) were sited here because the earthen ditch across from the fairgrounds drains into the detention pond where trash nets were installed.
- Street sweeping – This area is regularly swept on the fourth Tuesday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The City plans to improve its collaborative efforts with the fairground's concessionaire in the hopes of decreasing the amount of trash that leaves their property and enters the City's stormwater system. Opportunities exist to have on-site clean up events and to improve trash bins and containment management.


City of Pleasanton Full Trash Capture Map
Legend
Trash Generation Category
Low
Medium
High
Very High
Creek/Shoreline Hotspot
Full-Capture Location
Full Trash Capture
Non-Jurisdictional (Dot color = Generation Category)
Stream
Agency Boundary
Creeks
Parcel Boundary
0
0.225
0.45
0.9 Miles
Data Sources:
Roads: Alameda County
City Boundaries: Alameda County
Background: ESRI World Topographic Map
Map Created By:
EOA, Inc.
Date:
December 20th, 2012



3.2.5 Trash Management Area #5

Retail businesses at Hopyard Blvd. and Owens Dr.

This TMA is made up of mostly light industrial businesses that don't create a large volume of trash. However, there is one shopping center with a fast food restaurant, a stand-alone Home Depot, and a strip mall with a couple of small businesses, a gas station, and a fast food restaurant.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the first and third Tuesday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal

Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The city intends to pursue the most cost effective full-capture device for the TMA. The potential exists to install a CDS unit at the point nearest to where the area drains into the Zone 7 canal, or to install inserts into the storm drains throughout the TMA.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by the businesses in the area.

3.2.6 Trash Management Area #6

High density residential communities

This TMA is made up of two large high density apartment communities. This area generates a medium amount of trash as would be found in any typical high density residential area. The TMA drains entirely to one outfall of Junipero Canal.

Ongoing trash control measures:

- Street sweeping – This residential area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The city intends to pursue the most cost effective full-capture device for the TMA. The potential exists to install a trash net over drain pipe where it outfalls into the Junipero Canal, or to install inserts into the storm drains throughout the TMA.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by the residences in the area.

3.2.7 Trash Management Area #7

Stoneridge Mall

The Stoneridge Mall TMA is made up of a regional shopping center surrounded by commercial office buildings and a Sheraton Hotel. Because there are no freestanding fast food restaurant buildings, this TMA is fairly trash-free as compared to many other malls. The entire area drains to one storm pipe that empties into a Caltrans irrigation ditch adjacent to the I-680 freeway. This last section of this storm pipe runs under the Workday corporate offices and associated parking lot.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the first and third Wednesday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- There is a potential that an agreement with Workday could be negotiated that would provide an opportunity to install a CDS unit at the end of the storm pipe that drains this entire TMA. If not, then installing catch basin inserts would be the preferred alternative BMP.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.8 Trash Management Area #8

Pleasanton Unified Schools

This TMA is a conglomeration of the public schools within the City of Pleasanton. The 15 schools range from elementary (10) to middle (3) to high schools (2). The primary accumulations of trash around the schools are fast food wrappers, food containers, and cans and drink bottles.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.

Potential trash control measures:

- The city endeavors to work with the school district to develop an anti-litter campaign targeted at students. Studies of shown that focusing anti-litter campaigns at elementary school students have had the best results for changing behavior not only of the students but of their parents as well. Also, the city plans to recruit high school students to conduct trash assessments focusing on the highest trash generation areas.
- The city plans to conduct a survey of trash bins being used on campus to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by the schools.

3.2.9 Trash Management Area #9

Bernal and Gateway Plazas

This TMA consists of two shopping centers and a business park. On the south side of Bernal Ave. is a new Safeway shopping center that drains to the same detention basin

as the earthen ditch across from the fairgrounds. This detention basin has a trash capture net at each of its two inlets (see Full Trash Capture Map). On the north side of Bernal Ave. is an older shopping center with just a few small businesses and a business park behind it. The Bernal Shopping Center and the Koll Business Park generate minimal trash.

Ongoing trash control measures:

- Trash nets in detention basin.
- Street sweeping – This commercial area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The preferred alternative would be to install catch basin inserts around the Bernal Shopping Center and Koll Business Park.
- The city plans to meet with the operators of the Gateway Shopping Center to understand the sweeping regime for the parking lot and delivery areas.
- The city plans to conduct a survey of trash bins being used on campus to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by the schools.

3.2.10 Trash Management Area #10

Commerce Cr. along Johnson Dr.

This TMA is comprised of multiple commercial real estate and light industrial businesses with the Alamo Canal (owned by Zone 7 Water Agency) immediately to the west. Unlike many portions of the city that tie into a single outfall, this portion of the storm drain system has four single drain pipes, each serving several businesses, that outfall into the Alamo Canal. The primary types of trash in this area include fast food wrappers, solid waste products created from some of the light industrial businesses, and cans/bottles.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the first and third Tuesday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The optimum BMP for this TMA will be catch basin inserts. There are only a few storm drains in the area and they do not connect to a single outfall.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.11 Trash Management Area #11

Light Industrial Center on Santa Rita Rd.

This TMA is comprised of multiple light industrial businesses with the Arroyo Mocho Canal (owned by Zone 7 Water Agency) to the north and west. Unlike many portions of the city that tie into a single outfall, this portion of the storm drain system has five single drain pipes, each serving several businesses, that outfall into the Arroyo Mocho Canal. The primary types of trash in this area include fast food wrappers, solid waste products created from some of the light industrial businesses, and cans/bottles.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The optimum BMP for this TMA will be catch basin inserts. There are only a few storm drains in the area and they do not connect to a single outfall.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.12 Trash Management Area #12

Stanley Blvd. Commercial Area

This TMA is dominated by light industrial businesses with a little bit of high density residential. The area is bordered by Stanley Blvd on the north, Alameda County Transportation Corridor to the west, and single family residential to the south and east. The Arroyo Del Valle Canal (owned by Zone 7 Water Agency) runs down the middle of this TMA and is where all storm drains outfall. This area does not generate as much trash as the calculations would indicate, but the city plans to proceed with BMPs as if it were an area of medium trash generation.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The optimum BMP for this TMA will be catch basin inserts. There are only a few storm drains in the area and they do not connect to a single outfall.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.13 Trash Management Area #13

Valley Care Hospital

This TMA is a regional hospital. The hospital building is surrounded by a large open-air parking lot. There are about a dozen storm drains scattered around the perimeter of the lot that drain to two different outfalls into the Tassajara Creek (owned by Zone 7 Water Agency). It is quite possible that after the City conducts its on-land trash assessment that this TMA will be removed for lack of significant trash generation. If not the City will likely pursue catch basin inserts as the appropriate BMP. Most trash at this site consists of fast food wrappers, can and bottles, cigarette butts and candy wrappers.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.

Potential trash control measures:

- The preferred BMP will likely be to install catch basin inserts since storm water flows from the property in two different directions and there are only about a dozen storm drains.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.14 Trash Management Area #14

Walmart Center on Santa Rita Rd.

This TMA is a strip mall made up of numerous small businesses, a Walmart Neighborhood Grocery store, and a gas station. The trash concerns for this center are located in the rear by the dumpsters and the occasional piece of trash around the gas station. This

property drains directly to the Arroyo Mocho Canal (owned by Zone 7 Water Agency) but only has three storm drains, none of which are near the dumpster containment area.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.15 Trash Management Area #15

Post office and retail businesses

This area has quite a bit of foot traffic due to its proximity between a high school, an elementary school, a pre-school, and a community park. Trash in this area consists of fast food wrappers, bottles and cans, candy wrappers, and other assorted paper trash. The storm drains for this property connect to the same Paseo Pleasanton Canal (city-owned) outfall as the storm drains for TMA #3. Thus, the CDS unit proposed for TMA #3 will also capture any trash that enters the storm drain system in this TMA.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Tuesday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- If adequate funding is available the city intends to install a full-capture CDS device as close as possible to the end of the storm drain pipe near the outfall to the Paseo Pleasanton Canal (city-owned). This BMP should capture any trash emanating from the business center and park plus any trash entering the storm drains in the residential neighborhoods between these areas and the canal.
- The city plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.16 Trash Management Area #16

Raley's Shopping Center

This TMA is a small shopping center with a grocery store, a number of small businesses, and a couple of fast food restaurants. The trash issues of concern are fast food wrappers, cans and bottles. The entire shopping center flows into several storm drains that run along the front of the property, which is parallel to Sunol Blvd. This storm drain outfalls into Junipero Canal (city owned). As the canal crosses under Sunol Blvd. the city has installed three full-capture nets on the drain pipes (see Full Trash Capture Map).

Ongoing trash control measures:

- Trash nets in Junipero Canal.

- Street sweeping – This commercial area is regularly swept on the second Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The City plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.17 Trash Management Area #17

Rite Aid shopping center at Valley and Hopyard

This TMA is made up of two adjoining shopping centers that share the same storm drain system and outfall in to the Pleasanton Canal (city-owned). The primary types of trash are fast food wrappers, can and bottles, candy wrappers, and other misc. trash items.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.

- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The City intends to pursue the most cost effective full-capture device for the TMA. The potential exists to install a CDS unit at the end of pipe where it outfalls into the Pleasanton Canal, or to install inserts into the storm drains throughout the TMA.
- The City plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.18 Trash Management Area #18

Shopping Center at Hopyard and W. Las Positas

This TMA is a relatively small strip mall at a relatively busy intersection. The primary types of trash are fast food wrappers, can and bottles, candy wrappers, and other misc. trash items. There are a few storm drains around the center that flow into a couple of different storm pipes that lead to the Arroyo Mocho Canal (owned by Zone 7 Water Agency).

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- The preferred BMP will likely be to install catch basin inserts since storm water flows from the property in two different directions and there are only about a half-dozen storm drains.
- The City plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.19 Trash Management Area #19

Church and open field

This TMA is made up of a community church and adjacent open field. The entire drainage area is the TMA plus surrounding single-family housing neighborhood. All of this area eventually drains to one outfall on the Alamo Canal (owned by Zone 7 Water

Agency). Currently this is not an area of concern for derelict trash. However, the city has designated it as a TMA because the open lot is permitted for multi-family residential construction and in the future trash accumulation in the storm drain system may be a concern.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the third Monday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

Potential trash control measures:

- With this TMA being a less than significant area of trash combined with the fact that installing a CDS unit is impractical for accessibility reasons, the City intends to install catch basin inserts at select locations within the TMA based upon further visual inspection of areas generating trash.
- In the event that multi-family residences are constructed on the open lot, then the City plans to conduct a survey of trash bins in this area to see if there is an opportunity to reduce the amount of trash entering the storm drain system generated by this commercial area.

3.2.20 Trash Management Area #20

Residential areas throughout the city

Nearly 60% of Pleasanton is single-family residential homes that generate a low amount of trash. We have included it as a TMA due to the size of the geographic area compared to other land uses. Because this area is a low trash generating area it is anticipated that the ongoing trash control measures will suffice in keeping trash out of the City's storm drain system.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

3.2.21 Trash Management Area #21

Future retail development (Currently open space)

We have included this area as a TMA in the anticipation that the City will have to install full capture devices around this area in the future. Currently this TMA is a vacant open space but has been zoned for retail development. The City intends to have BMPs put in place as part of any future development project. For now the ongoing trash control measures are sufficient to keep trash out of the storm drain system.

Ongoing trash control measures:

- Street sweeping – This commercial area is regularly swept on the second Wednesday and fourth Thursday of every month. Sweeping was initiated prior to the MRP effective date and will continue through, and beyond July 2022.
- Code enforcement – As a way to minimize the amount of derelict trash from entering the storm water sewer system, the City of Pleasanton adopted a property maintenance ordinance (Chapter 9.28 of the Pleasanton Municipal Code) in September 1989, which is enforced by the city's Code Enforcement Division.

3.3 Jurisdiction-wide Control Measures

- Alameda County Waste Management Authority Single-Use Bag Ban Ordinance. Single-Use plastic bags were a significant component of the litter found in storm drains and water bodies throughout Alameda County. To address this issue, the Alameda County Waste Management Authority has adopted a single-use bag ban. As of January 1, 2013, all grocery stores, supermarkets, mini-marts, convenience stores, liquor stores, pharmacies, drug stores or other entities that sell milk, bread, soda and snack foods (all four items) and/or alcohol (Type 20 or21 license) in Alameda County must comply with the Single-Use Bag Ban Ordinance.
  A copy of the Ordinance is available on the Alameda County Waste Management Authority's website http://reusablebagsac.org/ordinancetext.html

- In addition to fully implementing the single-use bag ban ordinance the City has adopted 17 additional anti-litter ordinances applicable throughout the city. They are:
  Chapter 9.08 LITTER
  9.08.030 Litter in public places.
  9.08.040 Placement in receptacles to prevent scattering.
  9.08.050 Sweeping litter into gutters prohibited.
  9.08.060 Merchant's duty to keep sidewalks free of litter.
  9.08.070 Litter thrown by persons in vehicles.
  9.08.080 Truck loads causing litter.
  9.08.090 Litter in parks.
  9.08.100 Litter in lakes and fountains.
  9.08.110 Throwing or distributing handbills in public places.
  9.08.120 Placing handbills on vehicles.
  9.08.130 Dropping litter from aircraft.
  9.08.140 Litter on occupied private property.

9.08.150 Premises to be maintained free of litter.
9.08.160 Litter on vacant lots.
9.08.170 Clearing of litter from open private property.
9.08.180 Distribution of newspapers and handbills upon private premises.
Chapter 9.14 STORMWATER MANAGEMENT AND DISCHARGE CONTROL
9.14.080 Reduction of pollutants in stormwater.
9.14.090 Watercourse protection.

The City of Pleasanton is a member of Alameda County Clean Water Program (ACCWP). The jurisdiction-wide control measures described below will be conducted through participation in ACCWP.

- Litter Outreach to K-12 Schools
  K-12 schools are often high litter generation areas. ACCWP has developed a request for proposal for a four-year litter reduction education/outreach grant directed at K-12 schools throughout Alameda County. ACCWP intends to award a total of up to $125,000 per year to up to 4 successful applicants. The goals of the project are to clearly reduce the amount of litter at the participating schools and incorporate institutional changes at the schools so that litter will continue to be reduced in the future. Implementation is scheduled to begin in the 2014/15 school year. The request for proposal will include a requirement to evaluate the level of litter reduction achieved. A description of the successful proposals will be included in the ACCWP Fiscal Year 2013/14 Annual Report.

- Anti-Litter Outreach to Residents
  Through its Public Information and Participation program ACCWP encourages residents to adopt less polluting behaviors. One targeted behavior is littering, both intentional and unintentional. ACCWP uses a variety of mechanisms to influence residents including public service announcements, online and movie theater advertising, and participating in outreach events. The ACCWP Public Information and Participation Subcommittee is in the process of developing a three-year budget/strategic plan for fiscal years 2014/15 through 2016/17. One of the strategic objectives of the plan will be to reduce litter. This plan will be described in the ACCWP Fiscal Year 2013/14 Annual Report.

3.4 Creek and Shoreline Hot Spot Cleanups

- On June 18, 2013 the City sponsored a Pleasanton Waterways Spring Cleanup event along Mission Creek. This is the waterway that flows from the Alameda
- County Fairgrounds and Bernal Ave. ditch to the Arroyo De La Laguna Channel. Thirteen volunteers collected 52.5 lbs. of trash.

- On September 4, 2013 the City of Pleasanton joined with the Hacienda Business Owners Association to host the Pleasanton Greenscene Fair, which is an annual community-based festival focusing on conserving water, minimizing emissions, and reducing and recycling trash.
- On October 6, 2013 city staff joined with 20 volunteers to clean up the Arroyo Del Valle Canal. During the day 85 lbs. of miscellaneous trash was removed from the stream bed.

3.5 Control Measure Implementation Schedule

Table 3-2. City of Pleasanton's completed and planned trash control measure implementation schedule.

Trash Management Area and Control Measures	Pre-MRP	Short-Term					Long-Term							
		FY 2009-2010	FY 2010-2011	FY 2011-2012	FY 2012-2013	FY 2013-2014[a]	FY 2014-2015	FY 2015-2016	FY 2016-2017[b]	FY 2017-2018	FY 2018-2019	FY 2019-2020	FY 2020-2021	FY 2021-2022[c]
TMA #1														
Street Sweeping	X													
Code Enforcement	X													
CDS Unit												X		
Catch Basin Inserts									X					
Survey Trash Bins							X							
TMA #2														
Street Sweeping	X													
Code Enforcement	X													
CDS Unit												X		
Survey Trash Bins							X							
TMA #3														
Street Sweeping	X													
Code Enforcement	X													
CDS Unit												X		
Survey Trash Bins							X							
TMA #4														
Street Sweeping	X													
Code Enforcement	X													
Trash Nets					X									

Trash Management Area and Control Measures	Pre-MRP	Short-Term					Long-Term							
		FY 2009-2010	FY 2010-2011	FY 2011-2012	FY 2012-2013	FY 2013-2014[a]	FY 2014-2015	FY 2015-2016	FY 2016-2017[b]	FY 2017-2018	FY 2018-2019	FY 2019-2020	FY 2020-2021	FY 2021-2022[c]
Survey Trash Bins							X							
TMA #5														
Street Sweeping	X													
Code Enforcement	X													
CDS Unit												X		
Survey Trash Bins							X							
TMA #6														
Street Sweeping	X													
Code Enforcement	X													
Trash Net or Catch Basin Inserts									X					
Survey Trash Bins							X							
TMA #7														
Street Sweeping	X													
Code Enforcement	X													
CDS Unit or Trash Nets												X		
Survey Trash Bins							X							
TMA #8														
Street Sweeping	X													
Survey Trash Bins							X							
TMA #9														
Street Sweeping	X													
Code Enforcement	X													
Trash Nets					X									
Catch Basin Inserts									X					

Trash Management Area and Control Measures	Pre-MRP	Short-Term					Long-Term							
		FY 2009-2010	FY 2010-2011	FY 2011-2012	FY 2012-2013	FY 2013-2014[a]	FY 2014-2015	FY 2015-2016	FY 2016-2017[b]	FY 2017-2018	FY 2018-2019	FY 2019-2020	FY 2020-2021	FY 2021-2022[c]
Survey Trash Bins							X							
TMA #10														
Street Sweeping	X													
Code Enforcement	X													
Catch Basin Inserts									X					
Survey Trash Bins							X							
TMA #11														
Street Sweeping	X													
Code Enforcement	X													
Catch Basin Inserts									X					
Survey Trash Bins							X							
TMA #12														
Street Sweeping	X													
Code Enforcement	X													
Catch Basin Inserts									X					
Survey Trash Bins							X							
TMA #13														
Street Sweeping	X													
Catch Basin Inserts									X					
Survey Trash Bins							X							
TMA #14														
Street Sweeping	X													
Code Enforcement	X													
Survey Trash Bins							X							

Trash Management Area and Control Measures	Pre-MRP	Short-Term					Long-Term							
		FY 2009-2010	FY 2010-2011	FY 2011-2012	FY 2012-2013	FY 2013-2014[a]	FY 2014-2015	FY 2015-2016	FY 2016-2017[b]	FY 2017-2018	FY 2018-2019	FY 2019-2020	FY 2020-2021	FY 2021-2022[c]
TMA #15														
Street Sweeping	X													
Code Enforcement	X													
CDS Unit												X		
Survey Trash Bins							X							
TMA #16														
Street Sweeping	X													
Code Enforcement	X													
Trash Nets					X									
Survey Trash Bins							X							
TMA #17														
Street Sweeping	X													
Code Enforcement	X													
Trash Net or Catch Basin Inserts									X					
Survey Trash Bins							X							
TMA #18														
Street Sweeping	X													
Code Enforcement	X													
Catch Basin Inserts									X					
Survey Trash Bins							X							
TMA #19														
Street Sweeping	X													
Code Enforcement	X													
Catch Basin Inserts									X					

Trash Management Area and Control Measures	Pre-MRP	Short-Term					Long-Term							
		FY 2009-2010	FY 2010-2011	FY 2011-2012	FY 2012-2013	FY 2013-2014[a]	FY 2014-2015	FY 2015-2016	FY 2016-2017[b]	FY 2017-2018	FY 2018-2019	FY 2019-2020	FY 2020-2021	FY 2021-2022[c]
Survey Trash Bins							X							
TMA #20														
Street Sweeping	X													
Code Enforcement	X													
TMA #21														
Street Sweeping	X													
Code Enforcement	X													
Jurisdiction-wide Control Measures														
City of Pleasanton Anti-litter Ordinance	X													
C of Pleasanton Stormwater Ordinance		X												
Single-Use Bag Ban					X									
K-12 School Outreach							X			Activities to be determined				
Litter related outreach to residents							X		Activities to be determined					
Creek and Shoreline Hot Spot Cleanups														
Waterways Spring Cleanup						X								
Green Scene Fair			X											

[a]July 1, 2014 - 40% trash reduction target
[b]July 1, 2017 - 70% trash reduction target
[c]July 1, 2022 - 100% trash reduction target

4.0 Trash Assessment Strategy

Provision C.10.a.ii of the MRP requires Permittees to develop and implement a trash load reduction tracking method that will be used to account for trash load reduction actions and to demonstrate progress and attainment of trash load reduction targets. In the development of what the City of Pleasanton hopes is a robust and comprehensive trash assessment strategy, the City has taken elements from the monitoring plans of the County of Los Angeles, City of Long Beach, and the Bay Area Stormwater Management Agencies Association to create this strategy.

4.1 Trash Assessment Plan

The City of Pleasanton Trash Assessment Plan will include the following monitoring protocols, which are intended to provide sufficient repeatable controls, so that an accurate measurement of the City's ongoing trash reduction program can be adequately measured over time as trash control measures outlined in section 3.0 are implemented and refined:

- Location of monitoring sites and sampling frequency;
- A description of the role and responsibilities of all the participants in the monitoring;
- A general description of how data are intended to be utilized for feedback into the stormwater management program.

An up-to-date Assessment Plan shall be submitted to the Regional Board Executive Officer, when so requested, and assessment results will be included in the Annual Report of Waste Discharge.

4.2 Trash Assessment Program

The following Trash Assessment Program is designed to meet the objectives as stated in the MRP C.10.a.ii:

- In 2014, prior to submitting its Annual Stormwater Report, the City will complete a trash generation study to establish a baseline of actual trash accumulation amounts in each of the Trash Management Areas listed in section 3.0 (excluding TMA 20, which is made up of residential neighborhoods).
- Beginning in 2015, and continuing each successive year, the City will monitor for trash accumulation from the three highest trash generating TMAs (see section 3.0) at all end of pipe outfall storm drain sites, and all locations where a trash full-capture BMP has been installed. If any of these locations is physically inaccessible, then the City will monitor at the next highest trash generating TMA.
- The City will monitor three times during the calendar year, once in the month of September, once after the first 1" rain event after the September monitoring, and once at the end of the first month that has three ¾" rain events.
- Trash assessment documentation will consist of:
    - Dated photographs taken from the TMA outfalls;

- Weighing the load amounts captured and delineating these amounts by BMP type, so that BMP effectiveness can be evaluated and the results shared with other ACCWP members.
- Making a visual inspection of the area immediately downstream of full-capture devices to see if derelict trash has bypassed the devices.